

January 28, 2019

Mr. Tom Estock Quad/Graphics Inc. N61 W23044 Harry's Way Sussex, WI 53089-3995

Re:

Letter of Technical Deficiency VMM Eckman, LP eFACTS PF No. 819178 4581 Lower Valley Road West Sadsbury Township Chester County

Dear Mr. Estock:

The Department of Environmental Protection (DEP) has received and reviewed the July 31, 2018, document titled "Remedial Investigation Report" (report), received on October 30, 2018, for the property referenced above. The report was prepared by GHD and submitted to DEP in accordance with the Land Recycling and Environmental Remediation Standards Act (Act 2).

The procedures and regulations set forth in Act 2 must be followed in order for your site to qualify for the liability protection provided by the Act. Upon initial review, DEP finds the submission is technically deficient and the following items are needed to complete your submission:

- 1. Submittal of an administratively and procedurally complete risk assessment report for the J&E modelling regarding vapor intrusion (25 Pa. Code Section 250.409(1))
- 2. Vertical delineation of chlorinated solvent contamination in groundwater (25 Pa. Code Section 250.408(b)(2))
- 3. Horizontal delineation of chlorinated solvent contamination in groundwater (25 Pa. Code Section 250.704(b))
- 4. Evaluation of the groundwater to surface water pathway (25 Pa. Code Section 250.404)

Please address the above summarized technical deficiencies within 60 days. If the deficiencies noted above are corrected and a report resubmitted to DEP within 60 days, it will not be necessary to resubmit report review fees, resend the municipal notice, or republish the public notice. Please include a copy of this correspondence with any resubmission to confirm to DEP staff that an administrative completeness check is not necessary. If the corrected report is resubmitted later than 60 days from the date of this letter, the resubmitted report will need to include the appropriate fees and proofs of municipal and public notices.

We look forward to assisting you in the remediation of this property and encourage you to contact us throughout this process. If you have any questions or need further information regarding this matter, please contact Lyle de la Rosa by email at ldelarosa@pa.gov or by telephone at 484.250,5790.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board), pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board Rachel Carson State Office Building, Second Floor 400 Market Street P.O. Box 8457 Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800.654.5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at http://ehb.courtapps.com or by contacting the Secretary to the Board at 717.787.3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

Important legal rights are at stake. You should show this document to a lawyer at once. If you cannot afford a lawyer, you may qualify for free pro bono representation. Call the secretary to the board at 717.787.3483 for more information. You do not need a lawyer to file a notice of appeal with the board.

If you want to challenge this action, your appeal must be filed with and received by the board within 30 days of receipt of notice of this action.

Sincerely,

Ragesh R. Patel Regional Manager

Environmental Cleanup and Brownfields

cc:

Ms. Costello, GHD

Ms. Iddings, Esq.

Mr. Brown, P.G.

Mr. de la Rosa

Ms. Bass

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